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Attorney for Plaintiff

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF PENNSYLVANIA

NINGBO BONNY E-HOME CO.,
LTD., a corporation of China

Plaintiff,

v.

ONDWAY, POOLCLEAN US
STORE, USA WAREHOUSE,
BOWANJIE, INPOOL US STORE,
DEWFOND, DIGIGER,
MOTOBUDDY STORE, and et al.
Individual, Partnerships
Defendants.

Case No. 2:24-cv-00568

DECLARATION OF Hong Chuan
Zhang

DECLARATION OF HONGCHUAN ZHANG

I, Hong Chuan Zhang, hereby declare as follows:

1. I am President NINGBO BONNY E-HOME CO., LTD., a corporation of China and the Plaintiff in this case of infringement. The case was brought against Defendants who violate my US design patent by selling in the United States products which infringe the patent owned by my company, Ningbo Bonny E-Home Co., Ltd..
Defendants are selling pool brushes that infringe my company's design patent. Defendants offer and sale of infringing products has damaged our business and severely reduced revenues.

2. I am personally knowledgeable of the matters set forth in this Declaration and, if called upon to do so, I could competently testify to these facts.
3. I am making this declaration in response to Order No 10 in this case.
4. My company retained RayChan IP Law firm, located at 108 N Ynez Ave #213, Monterey Park, CA 91754 to pursue Defendants.
5. I have been informed concerning Order No 10 in this case and understand that the Court has asked me to make a declaration of my understanding of the terms of the Order and how my company would like to proceed in the infringement case.
6. As to Order No. 10, my lawyers have explained that the Court has rejected my company's motion from July 2024, for "alternative" notice to Defendants by email because it was procedurally lacking a proposed order and declaration and also should include notice by website publication. I have instructed my lawyers to address each of the deficiencies and file a revised version of that motion.
7. Defendants' sales of infringing products have damaged our business and have experienced reduced revenues that I attribute to the infringing products being sold on the market. I provided my lawyers with evidence of the reduced revenues and the need to stop those sales.
8. My lawyers have informed me that the motion we filed for a temporary injunction has been denied in Order no 10 because the request for relief was not specific enough to the damage we experienced. My lawyers have also informed me that the Court said that the motion papers did not prepare a sufficiently detailed order.
9. I understand that Order No 10 states that in order to obtain an injunction my lawyers need to file a new motion that meets detailed legal requirements. I have instructed them to move forward with refiling for injunctive relief that

emphasizes the severe losses my company has experienced and that properly rewrites the requests for relief. I respectfully declare that the total sale order of the patented product on Amazon.com dropped from US\$494,789.86 in 2022 to only US\$129,655.91 in 2024, a drop of more than 70% due to the infringement activities, and that the original ranking of the patented product on Amazon.com was around 4-5 in category of pool brush in 2022 but was dropped out of the ranking list in 2024.

10. I also understand that the Court has stated that I may obtain new legal counsel. However, my lawyers have filed the complaint and motion timely and correspondingly and I have decided to give them a chance to refile the motion for injunction as well as the motion for alternative service.

I declare under penalty of perjury that the foregoing is true and correct.

Executed at Ningbo China

March 19, 2025

ZHANG HONGCHUAN

Hongchuan Zhang, President Ningbo Bonny E-Home Co, Ltd.